

Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA)

AWMD / WEMM  
APR 30 2014  
RECEIVED

TO: Facility Name: St. Mary's Health Center  
Address: 100 St. Mary's Medical Center  
St. Mary's Health Center  
St. Mary's Health Center

EPA ID Number: DOR100542522

Date: 04/03/2014

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation

Description of Violation

1) 106.25-5.262(1) incorporating  
40 CFR 262.11

A hazardous waste determination not conducted on the  
chemotherapy hood filters prior to being cleaned with  
water.

2) 106.25-5.262(1) incorporating  
40 CFR 262.34(a)(2)

Containers storing hazardous waste not marked  
with the date of accumulation (Hazardous Waste Storage Containers)  
(A) Less Than 90 days, Hazardous Waste Accumulation Area  
- 25 two gallon containers of hazardous waste  
- Five 15 gallon containers of hazardous waste

3) 106.25-5.262(2)(c) 2.62(1)(ii)  
incorporating 40 CFR 265.174

Use of hazardous waste, in packaging not satisfactory  
containers not dated and inadequate spillage spread.

You are requested to submit a written response within **14 calendar days** of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII

Environmental Services Division

300 Minnesota Avenue

Kansas City, Kansas 64101

ATTN: Michael S. Martin

If you have any questions about this Notice or wish to discuss your response, you may call me at

(913) 531-7147

, or Stacie Tucker

(Compliance Officer) at

(913) 531-7715

This Notice prepared by

Michael S. Martin

Date:

04/03/2014

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name:

Doug Beckwith

Date:

4/13/14

Signature:

Doug Beckwith

Title:

ESD Director





Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
EPA ID Number: \_\_\_\_\_ Date: \_\_\_\_\_

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Citation

Description of Violation

4) 10 CSR 25-5.262(1) incorporating  
40 CFR 265.35

Inadequate spill space provided at the Less Than  
90 Day

5) 10 CSR 25-5.262(1) incorporating  
40 CFR 262.34(2)(i)(i) referencing  
40 CFR 265.173(b)

Hazardous waste satellite accumulation container not  
kept closed.  
(A) Pharmacy  
- One 2 gallon satellite container of bulk chemotherapy waste

6) 10 CSR 25-5.262(1) incorporating  
40 CFR 262.34(2)(i)(ii) as modified  
by 10 CSR 25-5.262(2)(b)3

Hazardous waste satellite accumulation containers  
not marked with the beginning date of Accumulation

You are requested to submit a written response within **14 calendar days** of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII

ATTN. \_\_\_\_\_

If you have any questions about this Notice or wish to discuss your response, you may call me at \_\_\_\_\_, or \_\_\_\_\_ (Compliance Officer) at \_\_\_\_\_.

This Notice prepared by

Michael S. Martin

Date:

04/03/2014

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name:

Signature:

Title:

Doug Beithman

Date:

4/13/14

EVS Director



Notice of Violation Pursuant to Requirements  
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EPA ID Number: \_\_\_\_\_ Date: \_\_\_\_\_

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Citation

Description of Violation

(A) Pharmacy

- Four 2 gallon containers and one 13 gallon container

(B) 2nd Floor

- Two 2 gallon containers and one 13 gallon container

(C) 3rd Floor

- Four 2 gallon containers

(D) 4th Floor

- Three 2 gallon containers and one 13 gallon container

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U. S. Environmental Protection Agency, Region VII

ATTN: \_\_\_\_\_

If you have any questions about this Notice or wish to discuss your response, you may call me at \_\_\_\_\_, or \_\_\_\_\_ (Compliance Officer) at \_\_\_\_\_.

This Notice prepared by

Michael J. Martin

Date:

04/03/2014

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name:

Dorey Beckham

Date:

4/3/14

Signature:

Dorey Beckham

Title:

ESD Director



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Description of Violation

- 7) 10G.R. 25-5.262(3)(D) 2.C  
Signed Uniform hazardous waste manifests not returned within 35 days / exception report not submitted within 45 days.  
Uniform hazardous waste manifest 11/11/2013, 02/13/2013, 08/02/2013, and 05/03/2012 (000640358 P.C., 000463464 P.C., 005691207 FLE, and 005153121 FLE)
- 8) 40 CFR 268.7(a)(6)(7)  
An one-time LDR notice not on file for the disposal of the gram stain waste, waste alcohol, and Diff-Quik waste fixative
- 9) 10G.R. 25-5.262(1) interpreting  
40 CFR 262.34(a)(4) referencing  
40 CFR 265.16(a)(2)  
2013 RCRA Hazardous Waste Management training (including contingency plan implementation) not provided and the 2012 training did not include the contingency plan implementation.

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This Notice prepared by Michael J. Martin Date: 04/03/2014

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Doug Beckman Date: 4/3/14  
Signature: Doug Beckman  
Title: EVS Director



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Citation

Description of Violation

10) 10 CSR 25-5.262(1) incorporating  
40 CFR 262.34(a)(4) referencing  
40 CFR 265.16 (d)

Training Plan not maintained (job titles, job descriptions,  
hrs. names of employees filling each position, written  
description of training.

11) 10 CSR 25-5.262(1) incorporating  
40 CFR 262.34(a)(4) referencing  
40 CFR 265.53(a)

Contingency Plan (RCRA Hazardous Waste Contingency Plan)  
not maintained.

12) 10 CSR 25-16.273(1) incorporating  
40 CFR 273.15(c)

The length of time of universal waste accumulation not  
demonstrated.

(A) BioMed - 170 universal waste - batteries

(B) Facilities Dept - 100 universal waste - lamps

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This Notice prepared by

Michael S. Martin

Date:

04/03/14

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name:

Doug Beckman

Date:

4/3/14

Signature:

Doug Beckman

Title:

EUS Director



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Citation	Description of Violation
13) 10 CSR 25-16.273(1) incorporating 40 CFR 273.16	Employees not provided with Universal Waste Management training.
14) 10 CSR 25-16.273(1) incorporating 40 CFR 273.14(a)	Universal Waste - batteries not properly labeled - Some items cited in Citation #12
15) 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(d)(1)	Universal Waste - lamps not stored in a closed container - Some items cited in Citation #12
16) 10 CSR 25-16.273(1) incorporating 40 CFR 273.14(b)	Universal Waste - lamps not properly labeled - Some items cited in Citation #12

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Date: 4/13/14